

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MALONE
TO PUBLIC REPRESENTATIVE DISCOVERY REQUESTS
(PR/USPS-T1-25(b), (c) - (f))
(February 19, 2014)**

In accordance with Presiding Officer's Ruling No. N2014-1/5 (February 14, 2014), the United States Postal Service hereby files the responses of witness Linda Malone to the above-identified parts of interrogatory PR/USPS-T1-25. The above-referenced parts of the interrogatory are stated verbatim and followed by the responses.

Respectfully submitted,

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MALONE TO INTERROGAOTRY OF THE PUBLIC REPRESENTATIVE

PR/USPS-T1-25

The Postal Service recently announced plans to delay Phase 2 of its Network Rationalization Initiative.

. . .

- b. Please discuss and explain in detail the interaction between the Load Leveling Initiative and Mail Processing Network Rationalization (MPNR).

. . .

- c. Did Phase 1 of MPNR impact the volume of mail delivered on Mondays? Please identify, describe, and provide all documents detailing the impact of Phase 1 of MPNR on the percentage of volume delivered on Mondays.
- d. Is Phase 2 of MPNR expected to impact the volume of mail delivered on Mondays to meet service standards? Please identify, describe, and provide all documents detailing the impact of Phase 2 of MPNR on the percentage of volume delivered on Mondays.
- e. Did Phase 1 of MPNR impact the percentage of carriers on the street after 1700? Please identify, describe, and provide all documents detailing the impact of Phase 1 of MPNR on carriers working after 1700.
- f. Will Phase 2 of MPNR impact the percentage of carriers on the street after 1700? Please identify, describe, and provide all documents detailing the impact of Phase 2 of MPNR on carriers working after 1700.

RESPONSE

- (b) Load leveling will take place among the mail processing plants and delivery units within the postal network that play a role in processing or delivering DSCF Standard Mail. The Mail Processing Network Rationalization initiative is intended to consolidate mail processing plant operations to make them more efficient overall, and will reduce the number of mail processing plants within the postal network. The opportunity to meet service expectations in the more efficient network that will emerge from MPNR will be enhanced by the implementation of load leveling, since it gives plant managers greater operational flexibility with

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Response to PR/USPS-T1-25 (continued)

respect to DSCF Standard Mail during the same time of the week that there is more DSCF Standard Mail volume on hand to process. And, as explained in my response to PR/USPS-T1-5, application of Lean Mail Processing principles throughout the mail processing network will help improve the staging and transfer of mail between operations.

The Postal Service has not performed analysis in connection with the network rationalization initiative reviewed by the Commission in Docket No. N2012-1 that is designed to or would shed light on whether:

- (c) implementation of Phase 1 of the initiative has had or is having an impact on the volume of mail delivered on Mondays; or
implementation of Phase 1 of the initiative has had or is having an impact on the percentage of mail delivered on Mondays; or
- (d) implementation of Phase 2 of the initiative will have any impact on the volume of mail delivered on Mondays;
implementation of Phase 2 of the initiative will have any impact on the volume of mail delivered on Mondays within the applicable service standard;
- (e) implementation of Phase 1 of the initiative has had or is having an impact on the percentage of carriers on the street after 5:00pm; or
- (f) implementation of Phase 2 of the initiative will have any impact on the percentage of carriers on the street after 5:00pm. .

Accordingly, there are no documents responsive to portions (c)-(f) of the interrogatory.